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8 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13  
14 UNITED STATES OF AMERICA, ) CR No. 07-0454 PJH  
15 Plaintiff, )  
16 v. ) STIPULATION AND [PROPOSED] ORDER  
17 SHANNON BLAYLOCK, ) TO CONTINUE MOTIONS/TRIAL SETTING  
aka ARLANDYS RICHARDSON, ) DATE AND TO EXCLUDE TIME UNDER 18  
18 aka "DADDY RICH", ) U.S.C. § 3161  
19 TAWAKONI SEATON, )  
aka TONI, and )  
20 LATOSHA GARDNER, )  
21 Defendants. )  
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22 This matter is on calendar for Motions / Trial Setting on Wednesday, February 20, 2008  
23 at 1:30 pm. For the following reasons, counsel for the government and counsel for defendants  
24 Blaylock and Seaton, respectfully request to continue this matter to March 26, 2008 at 1:30 pm.

25 On February 2, 2008, counsel for the Government was injured in an accident and has  
26 been on medical leave for much of the time since that date. On February 20, 2008, counsel for  
27 the government will have a knee surgery, necessitating additional estimated two weeks medical  
28 leave following the surgery. Although counsel for the government intends to return to work as

1 soon as possible, she has been advised by her doctor that she should plan for a two-weeks  
2 absence following the surgery. Further, counsel for Seaton is unavailable on March 5, 2008;  
3 counsel for Blaylock is unavailable on vacation from March 6, 2008 through March 25, 2008.

4 Counsel for the government and counsel for defendant Blaylock and Seaton agree that the  
5 time between February 20, 2008 and March 26, 2008 is properly excluded pursuant to the  
6 Speedy Trial Act, Title 18 United States Code, sections 3161(h)(8)(A) and 3161(h)(8)(B)(iv) for  
7 continuity of counsel. Although counsel for defendant Gardner does not contest the need for the  
8 continuance due to counsel for the government's medical situation and is available on March 26,  
9 2008, for the record, she objects to the continuance and exclusion of time for the reasons  
10 previously articulated in appearances before this Court.

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12 SO STIPULATED:

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14 JOSEPH P. RUSSONIELLO  
United States Attorney

15 DATED: February 14, 2008

16 /s/  
17 DENISE MARIE BARTON  
Assistant United States Attorney

18 DATED: February 14, 2008

19 /s/  
MICHAEL STEPANIAN  
Attorney for SHANNON BLAYLOCK

20 DATED: February 14, 2008

21 /s/  
JODI LINKER  
Attorney for LATOSHA GARDNER

22 DATED: February 14, 2008

23 /s/  
KENNETH WINE  
Attorney for TAWAKONI SEATON

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26 For the reasons stated above, the Court continues the date for Motions / Trial Setting  
27 from February 20, 2008, at 1:30 pm to March 26, 2008 at 1:30 pm. The Court finds that the for  
28 the foregoing reasons, the ends of justice served by granting the requested continuance outweigh

1 the best interests of the public and the defendant in a speedy trial and failure to do so would deny  
2 the government continuity of counsel, taking into account the exercise of due diligence. See 18  
3 U.S.C. § 3161(h)(8)(A) and 3161(h)(8)(B)(iv). Accordingly, time shall be excluded from  
4 February 20, 2008 through March 26, 2008.

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7 SO ORDERED.  
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10 DATED: 2/15/08



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